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April 4, 2025

VIA ECF

Hon. Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Neil Cole, 19 Cr. 869 (ER)

Dear Judge Ramos:

We represent Neil Cole in the above-captioned matter. We write to request an order from the Court allowing Mr. Cole to renew his now expired passport, currently held by Pretrial Services.

Procedural History

Mr. Cole was arrested in connection with this matter on December 5, 2019. In compliance with the conditions of release set by the Court, Mr. Cole surrendered his passport to Pretrial Services. ECF No. 17. The conditions of release also bar Mr. Cole from making any new applications. *Id.*

Request to Renew

We respectfully request that the Court allow Mr. Cole to renew his expired passport. If Mr. Cole's request is granted, Mr. Cole would retrieve his expired passport from Pretrial Services, solely for the purposes of renewing it. Once Mr. Cole is in possession of the renewed passport, he will immediately return it to Pretrial Services.

Positions of the Government and Pretrial Services

Neither the government nor Pretrial Services objects to this request.

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We appreciate the Court's consideration and are available to discuss, should the Court have any questions.

Respectfully submitted,



Sean Hecker